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August 5, 2020

By ECF

Honorable Katherine Polk Failla United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

Re: United States v. Ahuja and Shor, 18 Cr. 328 (KPF) Shor Surrender Date

Dear Judge Failla:

We hereby move to stay Mr. Shor's surrender date until the later of January 4, 2021 or 90 days after this Court's ruling on any motion that Shor makes at the conclusion of the fact-finding process discussed at the July 24, 2020 conference. The government's consent to this stay was conditioned on Mr. Shor agreeing to forego making any motion for bail pending appeal until this Court resolves the above-mentioned motion practice as it pertains to Shor. We have agreed to this condition.

We also note that the Second Circuit today granted the defense's consent motion to hold the appeal in abeyance pending further proceedings in the District Court. I have attached hereto the Second Circuit's Order.

Respectfully submitted,

Justin S. Weddle

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Application GRANTED.

SO ORDERED.

Dated: August 5, 2020 New York, New York

HON. KATHERINE POLK FAILLA UNITED STATES DISTRICT JUDGE

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